

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF DEEVA SHAH IN SUPPORT OF OPPOSITION
TO PLAINTIFF'S MOTION TO COMPEL INSPECTION, TESTING, AND
SOURCE CODE OF THE ACCUSED PRODUCTS**

I, Deeva Shah, declare and state as follows:

1. I am an attorney licensed to practice law in the State of California and admitted to practice before this Court. I am an attorney at the law firm of Keker, Van Nest and Peters, LLP and counsel for Defendant Google LLC, (“Google”) in the above-captioned action.

2. I submit this declaration in support of Google’s Opposition in support of Plaintiff’s Motion to Compel Inspection, Testing, and Source Code of the Accused Products. I have personal knowledge of the facts stated herein and, if called as a witness, I could testify to them competently under oath.

3. Attached as **Exhibit 1** is a true and correct copy of an email thread between me and Kevin Gannon, dated February 19, 2021 and March 1, 2021.

4. Attached as **Exhibit 2** is a true and correct copy of correspondence from me to Kevin Gannon, dated March 1, 2021.

5. Attached as **Exhibit 3** is a true and correct copy of an email thread between me and Kevin Gannon, dated July 16-19, 2021.

6. Attached as **Exhibit 4** is a true and correct copy of an email from Kevin Gannon to Nathan Speed, dated July 23, 2021.

7. Attached as **Exhibit 5** is a true and correct copy of correspondence from Carrie Parker to Singular Counsel, dated November 6, 2020.

8. Attached as **Exhibit 6** is a true and correct copy of an email thread between Matthias Kamber and Brian Seeve, dated July 8-9, 2021.

9. Attached as **Exhibit 7** is a true and correct copy of correspondence from Brian Seeve to Matthias Kamber, dated July 22, 2021.

10. Attached as **Exhibit 8** is a true and correct copy of correspondence from Matthias Kamber to Brian Seeve, dated July 23, 2021.

11. Attached as **Exhibit 9** is a true and correct Declaration of a Google Senior Site Facility Manager in support of Google's Opposition to Singular's Motion to Compel Inspection, Testing and Source Code of the Accused Products, dated August 6, 2021.

12. Singular has served a number of discovery requests that meet at least the procedural requirements of the Federal Rules of Civil Procedure, including multiple sets of requests for production that explicitly state that they are requests under Rules 26 and 34 of the Federal Rules of Civil Procedures.

13. I understand that Singular reviewed Google's source code in Boston on December 14, December 21, and December 22, 2020. I understand that Singular reviewed the source code in San Francisco on July 8, July 20, and July 21, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 6, 2021 at Castro Valley, California.

/s/ Deeva Shah

Deeva Shah

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed
Nathan R. Speed